

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 13-10083-FDS

SHEKEIRA WILLIAMS, et al., pro se,  
Plaintiffs,  
v.

LUIS SPENCER, et al.,  
Defendants.

**DEFENDANTS' INITIAL DISCLOSURES**

The Defendants hereby disclose the following information, pursuant to  
Fed.R.Civ.P. 26(a)(1)(A):

- (i) Individuals Likely to have Discoverable Information – Along with the Subjects of that Information - that the Defendants May Use to Support its Claims or Defenses (other than for the sole use of impeachment).

Correction Officer Lesly Pierre, regarding the incident.

IPS Officers Bryan Wozniak and Carlos Goden, regarding the incident.

Sergeant Gregory Spring, regarding the incident.

Lieutenant Peter Peladeau, regarding the incident.

SBCC Superintendent Bruce Gelb, concerning the visitor bar and its subsequent removal with regard to plaintiff Shekeira Springer (“Springer”).

The business address for all of the above is SBCC, P.O. Box 8000, Shirley, MA 01464. Contact should be made only through Department counsel of record.

Massachusetts State Troopers David Lambirth and Douglas Grout, regarding the incident.

- (ii) Documents, Electronically Stored Information and Tangible Things in the Possession, Custody or Control of the Defendants that the Defendants May Use to Support its Claims or Defenses (other than for the sole use of impeachment).

Photographs of drugs found in visitor side of South SMU visitor area, Notice of Barred Visitor letter to Springer dated June 4, 2012, Letter from Superintendent Gelb to Springer dated June 26, 2012, Letter from Superintendent Gelb to plaintiff

Donald Williams (“Williams”) dated July 9, 2012, Reinstatement of visits letter to Springer dated May 16, 2013, and Springer’s June 3, 2012 Request to Visit Inmate form.

(iii) Computation of Damages

Defendants are not seeking damages.

(iv) Insurance Agreements

There are no insurance agreements.

Dated: September 17, 2013

For the Defendants,

NANCY ANKERS WHITE  
Special Assistant Attorney General

---

C. Raye Poole  
BBO No. 632719  
Department of Correction  
70 Franklin Street, Suite 600  
Boston, Massachusetts 02110-1300  
(617) 727-3300, Ext. 147  
[CRPoole@doc.state.ma.us](mailto:CRPoole@doc.state.ma.us)

Certificate of Service

I, C. Raye Poole, counsel for the above named defendants, hereby certify that on this 17<sup>th</sup> day of September 2013, I served a copy of the above motion by first class mail, postage prepaid, on the plaintiff, Donald Williams, W-97372, at his last known address, SBCC, P.O. Box 8000, Shirley, MA 01464, and on the plaintiff, Shekeira Springer, at her last known address, 16 Stockton Street, Dorchester, MA 02124.

/s/ C. Raye Poole  
C. Raye Poole